

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2024 MAY 28 AM 11:11

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL E. JONES,

Defendant.

CASE NO. 24-00090

JUDGE S. J. S.

INDICTMENT

18 U.S.C. § 2

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(8)

18 U.S.C. § 1343

18 U.S.C. § 1349

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(B)(viii)

21 U.S.C. § 841(b)(1)(C)

FORFEITURE

THE GRAND JURY CHARGES:

COUNT 1

Possession with Intent to Distribute 50 Grams or more of Methamphetamine
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii) and 18 U.S.C. § 2].

On or about October 12, 2023, in the Southern District of Ohio, the defendant,
MICHAEL E. JONES, did knowingly, intentionally, and unlawfully possess with the intent to
distribute 50 grams or more of a mixture and substance containing a detectable amount of
methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii), and 18 U.S.C. § 2.

COUNT 2

**Possession with Intent to Distribute Cocaine
[21 U.S.C. § 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2]**

On or about October 12, 2023, in the Southern District of Ohio, the defendant, **MICHAEL E. JONES**, did knowingly, intentionally, and unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

COUNT 3

**Felon in Possession of a Firearm
[18 U.S.C. §§ 922(g)(1) and 924(a)(8)]**

On or about October 12, 2023, in the Southern District of Ohio, the defendant, **MICHAEL E. JONES**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a Glock, Model 22, .40 caliber pistol, SN: LEV020 (Austria), said firearm having been shipped and transported in interstate and foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT 4

**Conspiracy to Commit Wire Fraud
[18 U.S.C. §1349]**

1) Beginning on or about July 27, 2020 and continuing through on or about March 9, 2021, in the Southern District of Ohio and elsewhere, the defendant, **MICHAEL E. JONES (JONES)**, did knowingly and willfully conspire and agree with others, both known and unknown to the Grand Jury, to violate 18 U.S.C. §1343, that is, with intent to defraud, **JONES** and co-conspirators knowingly devised a scheme for obtaining money and property by means of false and fraudulent pretenses, representations, or promises, and transmitted or caused to be

transmitted, wire communications in interstate commerce for the purpose of executing the scheme to defraud.

PUPROSE OF THE CONSPIRACY

2) It was the purpose of the conspiracy for **JONES** and co-conspirators to perpetuate a wire fraud scheme and unlawfully enrich themselves by filing a fraudulent application and weekly certifications for Pandemic Unemployment Assistance (PUA) benefits through the Ohio Department of Jobs and Family Services (ODJFS).

MANNER AND MEANS

3) It was part of the conspiracy that on or about July 27, 2020, **JONES** or a co-conspirator on behalf of **JONES** filed a fraudulent online PUA application.

4) It was further part of the conspiracy that the PUA application submitted to ODJFS falsely represented that **JONES** was employed as a “Helper” in the construction trade until March 13, 2020, and was currently unemployed as a result of the COVID-19 Pandemic.

5) It was further part of the conspiracy that **JONES** submitted or caused to be submitted online weekly recertifications to ODJFS that falsely represented that **JONES** was unemployed because of the COVID-19 Pandemic and that he was physically able and available to work during the listed reporting period.

6) It was further part of the conspiracy that on the dates the application and recertifications were submitted, **JONES** was not available to work, was not unemployed because of the COVID-19 Pandemic, and had not worked as a helper in the construction trade until March 13, 2020, but rather, was in the process of serving a prison sentence for unlawful drug distribution and having weapons while under a disability.

7) It was further part of the conspiracy that, as a result of **JONES’s** fraudulent

representations and certifications, **JONES** and co-conspirators received over \$11,000 in PUA payments.

All in violation of 18 U.S.C. §1349.

FORFEITURE ALLEGATION

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offense alleged in this Indictment, the defendant, **MICHAEL E. JONES**, shall forfeit to the United States, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in such offense, including, but not limited to:

- Glock, Model 22, 40 caliber pistol, SN: LEV020 (Austria);
- All related magazines and ammunition.

Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

s/Foreperson
FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY

s/Kenneth F. Affeldt
KENNETH F. AFFELDT, 0052128
Assistant United States Attorney